

**United States Bankruptcy Court
EASTERN DISTRICT OF WISCONSIN (MILWAUKEE)**

In re)	
	Cassandra C House)	Case No.: 19-29162-kmp
)	
	Debtor)	
)	
Address	<u>8318 N. 95th Street, Milwaukee, WI 53224</u>)	Chapter: 13
)	
Last four digits of Social Security or Individual Tax-payer)	
Identification (ITIN) No(s), (if any):	<u>3458</u>)	Judge Katherine M. Perhach

**NOTICE OF MOTION TO MODIFY THE AUTOMATIC STAY TO ALLOW DEBTOR
AND CREDITOR TO ENTER INTO A LOAN MODIFICATION AGREEMENT**

Deutsche Bank National Trust Company, as Trustee for Home Equity Mortgage Loan Asset-Backed Trust Series INABS 2007-B, Home Equity Mortgage Loan Asset-Backed Certificates Series INABS 2007-B the current mortgagee of record, its successors, servicing agents and/or assignees (hereinafter collectively the “Movant”), has filed papers with the court for an order for modifying the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion then, **within 14 days of the date of this notice**, you or your attorney must:

File with the court a written objection to the motion and a request for a hearing at:

Clerk, U.S. Bankruptcy Court
U.S. Courthouse
517 E. Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4500

If you mail your request and objection to the court for filing, you must mail it early enough so the court will receive it within 14 days of the date of this notice.

You must also send a copy to:

Matthew Comella
Codilis, Moody & Circelli, P.C.
15W030 North Frontage Road, Suite 200
Burr Ridge, IL 60527

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: August 10, 2020

Signature: /s/ Matthew Comella

Shawn R. Hillmann, Bar#1037005
Rachael A. Stokas, #61282MO
Peter C. Bastianen, IL Bar#6244346
Matthew Comella, Bar#1096303
Joel P. Fonferko, IL Bar No. 6276490
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(630) 654-9946 Fax
50-19-01750

NOTE: This law firm is a debt collector.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN (MILWAUKEE)**

IN RE:) Chapter: 13
Cassondra C House) Case No.: 19-29162-kmp
)
Debtor) Judge Katherine M. Perhach

**MOTION TO MODIFY THE AUTOMATIC STAY TO ALLOW DEBTOR AND
CREDITOR TO ENTER INTO A LOAN MODIFICATION AGREEMENT**

NOW COMES Deutsche Bank National Trust Company, as Trustee for Home Equity Mortgage Loan Asset-Backed Trust Series INABS 2007-B, Home Equity Mortgage Loan Asset-Backed Certificates Series INABS 2007-B (hereinafter “Movant”), by and through its attorneys, Codilis, Moody & Circelli, P.C. and respectfully requests that this Court enter an Order modifying the stay to allow Movant to negotiate a loan modification with the Debtor.

The parties wish to discuss and possibly enter into a loan modification agreement.

Movant requires an order from the Bankruptcy Court.

Wherefore, Movant respectfully requests that this Court enter an Order modifying the stay to allow Movant to negotiate a loan modification with the Debtor and authorizing the parties to enter into a loan modification agreement.

Dated this August 10, 2020.

Respectfully Submitted,

Codilis, Moody & Circelli, P.C.

By: /s/ Matthew Comella
Attorney for Movant

Codilis, Moody & Circelli, P.C.
15W030 North Frontage Road, Suite 200
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**UNITED STATES BANKRUPTCY COURT
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)
Debtor) Judge Katherine M. Perhach

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice and Motion upon the parties listed below, as to the Chapter 13 Trustee, U.S. Trustee and Debtor's Attorney via electronic notice on August 10, 2020 and as to the Debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on August 10, 2020.

Scott Lieske, Chapter 13 Trustee, P.O. Box 510920, Milwaukee, WI 53203
by electronic notice through ECF
Cassandra C House, Debtor, 8318 N. 95th Street, Milwaukee, WI 53224
Gregory T. Ryan, Attorney for Debtor, 631 N. Mayfair Road, Wauwatosa, WI 53226
by electronic notice through ECF
U.S. Trustee, Office of the U.S. Trustee, 517 East Wisconsin Ave., Room 430, Milwaukee, WI 53202
by electronic notice through ECF

Codilis, Moody & Circelli, P.C.

By: /s/ Matthew Comella
Attorney for Movant

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